Autumnwood ESH Consultants, LLC
6539 Autumnwood Court
Mount Pleasant, Wisconsin 53403
Phone: 262.237.1130

11 March 2014

Mr. John Nordine
U.S. EPA Region 5
RCRA Enforcement and Compliance Assurance Branch (LU-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Central Wire, Union, Illinois Revised Monthly Progress Report for January 2014

Dear Mr. Nordine:

Enclosed please find the Monthly Progress Report for the Central Wire facility located in Union, Illinois for the month of January 2014.

The eDMR for the groundwater pump and treat facility is also included in this report.

If you have any comments or questions regarding the progress of this project, please do not hesitate to call me at (262) 237-1130.

Sincerely,
Autumnwood ESH Consultants, LLC

John W. Thorsen, P.E.

JWT:jt

encl
cc:

Joyce Munie	IEPA
Robert Kay	USGS
Gerald W. Ruopp	Central Wire
Henry Lopes	Central Wire
Robert Johnson	Central Wire

MONTHLY PROGRESS REPORT
Central Wire Union, Illinois Site
January 2014

1. **Progress Made This Reporting Period** – This reporting period Central Wire continued the operation and maintenance of the groundwater extraction and treatment system. Central Wire treated an average of 594,000 GPD with a maximum daily flow of 599,000 gallons per day and met effluent limitations for pH; 1,1,1-Trichloroethane, Trichloroethene and Tetrachloroethene. The electronic Discharge Monitoring Report (eDMR) for January 2014 is attached to this report. This is still being misreported on the eDMR as 1,1,1-Trichloroethane, Trichloroethane and Tetrachloroethane, respectively. Since Central Wire cannot change this, a permit modification was requested of IEPA correct the permit on December 5, 2013 back to the original permit which set permit limitations and reporting requirements on 1,1,1-Trichloroethate, Trichloroethene and Tetrachloroethene. Central Wire has been informed by IEPA staff that the modification is ready to be issued, but as of this writing, it has not been received.

   The groundwater level monitoring data from downgradient monitoring well DGW-2I continues to be collected. However, as has taken place over the past two years, once the **Ex. 6 Personal Privacy (PP)** pump motors are removed from their engine mounts and stored for the winter, Central Wire has not been reporting the water levels until those motors are in place again in April or May of the following year.

2. **Summary of Validated Data and Results** – The semiannual RCRA groundwater and residential well samples were collected in December 2013. Central Wire has updated the graphs and plots and submitted them to EPA by email on February 4 and 6, 2014. They are also attached to this revised progress report along with the laboratory analysis report.

   EPA Maximum Contaminant Limits (MCLs) were exceeded in 8 of the 15 RCRA groundwater monitoring wells. These included MW-4 (Tetrachloroethene (PCE)), MW-5 (PCE), MW-5D (Trichloroethene (TCE)), MW-7 (PCE), MW-8 (PCE and TCE), MW-HBR (PCE), DGW-1I (1,1-Dichloroethene (DCE) and TCE) and DGW-1D (Vinyl Chloride). The data are provided in the attached analytical report and the data tables and graphs for each well.

   There were no detections in 7 of 15 groundwater monitoring wells including MW-2, MW-6, MW-9, DGW-1S, DGW-2S, DGW-2I and DGW-2D. There were also no detections in the five residential and one irrigation well that were sampled. The residences included the **Ex. 6 Personal Privacy (PP)** wells on Ex. 6 Personal Privacy (PP). The irrigation well was the well at S **Ex. 6 Personal Privacy (PP)**

   Generally the concentrations are trending down or remain steady and, as noted above exceed the MCLs for either TCE or PCE except MW-8 which exceeds for both TCE and PCE.

MW-2 has been below all MCLs since March of 2008 or 13 sampling rounds. MW-4 Has been decreasing, but still exceeds the MCL for PCE with the five most recent samples going from 48 ug/L in December 2011 to 22 ug/L in December 2013. Likewise, TCE in this well has been trending downward and has been below the MCL of 5 ug/L for the past three sampling rounds.

In monitoring well MW-5 only PCE exceeds an MCL and it has been trending generally downward since December 2003 when 1,1,1-Trichloroethane (TCA) and TCE also exceeded the respective MCLs. In the past four sampling rounds over two years the PCE levels have gone from 120 ug/L to 73 ug/L.

In monitoring well MW-5D, PCE has been below the MCL since December 2005 or the past 15 sampling rounds. TCE has trended downward since June 2012 from 32 to 18 ug/L. MW-6 had been above the MCL for PCE through December 2012 (6.3 ug/L), but has been just under the MCL (4.9 ug/L) for the past two sampling rounds.

MW-7 has historically exceeded MCLS for DCE, TCE and PCE. The DCE MCL has not been exceeded since December 2003 and the TCE and PCE values have been trending downward. PCE has gone from a high of 200 ug/L in December 2006 to 46 ug/L in December 2013, still above the MCL, and TCE has gone from a high of 64 in June 1995 to below the MCL at 3.5 ug/L in December 2013 and has been under 10 ug/L since December 2006 including three other values below the MCL.

MW-8 has historically exceeded the TCE and PCE MCLs with a high TCE value at 34 ug/L in June 1995 and the December 2013 value of 6.9 ug/L. PCE has trended downward also with a highs of 200 ug/L in January 2005 and October 2008 trending down to 72 ug/L in December 2013.

MW-9 historically exceeded the PCE MCL in April 2002, but ha been below the MCL in all sampling rounds since that time. MW-HBR, a well on the northeast corner of Highbridge and North Union Streets, has exceeded the PCE MCL trended downward from a high of 130 ug/L in December 2003 to a low of 48 ug/L in December 2013.

DGW-1S has not exceeded any MCLs. DGW-1I has historically exceeded MCLs for DCE, TCA, TCE, DCA and PCE. PCE last exceeded the MCL in April 2002. DCE last exceeded the MCL in December 2005. DCE has gone from 6 ug/L in February 1998 up to 110 ug/L in June 2010 and 120 ug/L in June 2012 and down to non-detect in December 2013 with values of 53 and 54 ug/L in December 2012 and June 2013, respectively. TCA has also risen and fallen during the sampling events going from no detection in February 1998 to 710 ug/L in June 2012 and down to 150 ug/L in December 2013. Lastly, TCE has also risen and fallen going from 4 ug/L in February 1998 to a high of 110 ug/L in December 2009 and down to 26 ug/L in December 2013

DGW-1D has exceeded MCLs for DCE 1,2-Dichloroethane (DCA), TCE and Vinyl Chloride. DCE has gone from a high of 98.4 ug/L in December 2005 to a non-detection in December 2013 and has been below the MCL in the past two sampling rounds. DCA

has generally been below the MCL of 5 ug/L but did exceed the MCL in December 2005, June 2006 and December 2012. TCE values in this well have risen and fallen going from an initial value of 4 ug/L to a high value of 110 ug/L and down to 26 ug/L in December 2013. Vinyl Chloride somewhat surprisingly appeared in June 2013 above the MCL of 2 ug/l at 8.1 ug/L and was again detected in December 2013 as 13 ug/L.

3. **Upcoming Events/Activities Planned** – The existing remediation systems will continue to operate as planned. Central Wire will respond to comments provided by EPA on Monthly reports and the Central Wire Union Plant 2012 RCRA Corrective Measures Implementation Progress Report which were clarified in our meeting on February 6, 2014. As a result of that meeting Central Wire requested and EPA approved a new submittal date of April 1, 2014.

4. **Anticipated Problem Areas and Recommended Solutions** – None.

5. **Key Personnel Changes** – None.

6. **Target and Actual Completion Dates** – This project has not deviated from the project schedule.